

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

COMPASS MARKETING, INC.

105 Eastern Avenue  
Annapolis, Maryland 21403  
(Anne Arundel County),

*Plaintiff,*

v.

FLYWHEEL DIGITAL LLC

1801 Porter St Suite 300  
Baltimore, MD 21230  
(Anne Arundel County),

JAMES COLUMBUS "CHIP" DIPOLA, JR.

11 Devon Hill Rd, Unit 4B  
Baltimore, Md 21210  
(Baltimore County),

PATRICK MILLER

743 Bywater Road  
Gibson Island, Md 20008  
(Anne Arundel County),

DANIEL WHITE

21900 Fairway Drive  
Leonardtown, Maryland 20659  
(St. Mary's County),

MICHAEL WHITE

39650 Hiawatha Circle  
Mechanicsville, Maryland 20659  
(St. Mary's County),

GEORGE WHITE

15125 Woodville Road  
Waldorf, Maryland 20601  
(Charles County), and

ASCENTIAL PLC,

The Prow, 1 Wilder Walk, London, England  
W1B 5AP.

*Defendants.*

Case Number: 1:22-cv-00379

**STIPULATION REGARDING DEADLINE FOR DEFENDANTS FLYWHEEL,  
ASCENTIAL, DIPAULA, AND MILLER TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Compass Marketing, Inc. (“Compass”) and Defendants Flywheel Digital LLC (“Flywheel”), Ascential PLC (“Ascential”), James Columbus “Chip” DiPaula Jr. (“DiPaula”), and Patrick Miller (“Miller”) hereby stipulate to forty-six (46) days, up to and including April 4, 2022, for Defendants to answer, move, or otherwise respond to Plaintiff’s Complaint, and state as follows:

1. On February 14, 2022, Plaintiff filed a complaint against Defendants Flywheel, Ascential, DiPaula, and Miller, among others (ECF 1).<sup>1</sup>

2. Defendants Flywheel, Ascential, DiPaula, and Miller accepted service of the Complaint through waiver of service of summons on February 16, 2022.

3. The parties stipulate and agree that Defendants Flywheel, Ascential, DiPaula, and Miller have forty-six (46) days, until April 4, 2022, to answer, move, or otherwise respond to Plaintiff’s Complaint.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel and subject to the approval of the Court, that Defendants Flywheel, Ascential, DiPaula, and Miller shall have up to and including April 4, 2022 to answer, move, or otherwise respond to Plaintiff’s Complaint.

Dated: February 18, 2022

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Steven A. Luxton, Esq.

Steven A. Luxton, Esq.

Respectfully submitted,

**VENABLE LLP**

/s/ G. Stewart Webb, Jr., Esq.

G. Stewart Webb, Jr., Esq.

<sup>1</sup> The other defendants which are not party to the instant motion are Michael White, Daniel White, and George White.

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Marketing, Inc.*

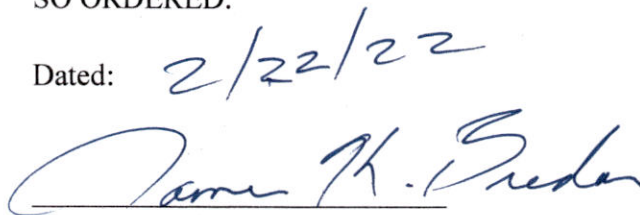
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*Attorneys for Flywheel Digital, Ascential, James  
DiPaula and Patrick Miller*

SO ORDERED.

Dated:



The Honorable James K. Bredar, Chief Judge